

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 15 of the)	
Commission's Rules Regarding)	ET Docket No. 99-231
Spread Spectrum Devices)	
)	

Comments of Motorola, Inc.

Motorola, Inc., hereby submits its comments in this proceeding. Motorola urges the Commission to move forward with the implementation of the proposals set forth in the Notice of Proposed Rule Making.¹

As one of the leading manufacturers of communications equipment, Motorola has long sought ways to bring to consumers the benefits of high-speed data communications. The United States is witnessing major growth in efforts to provide high speed digital connections not only to large businesses but also to small businesses and to homes. In this regard, Motorola has developed cable modem technology as well as other equipment necessary to facilitate high-speed access to the Internet. High-speed connectivity will not fulfill its promise, however, without systems to transport data over the last few meters in a cost effective, easy to implement manner. Wireless systems such as those that would be feasible under the first of the Commission's proposals will allow many different companies to develop products that will address this growing need. Accordingly,

¹ *In the Matter of Amendment of Part 15 of the Commission's Rules Regarding Spread Spectrum Devices*, ET Docket No. 99-231, *Notice of Proposed Rule Making*, FCC No. 99-149 (released June 24, 1999).

Motorola was a member of the Home RF Working Group and has reviewed the technical analysis supplied to the Commission by the Working Group. This analysis concurs with our own analysis which shows that wide band frequency hopping systems operating under these proposed new rules will not generate significantly more interference in this band than is allowed under the FCC's current rules. Therefore, we strongly support the approach proposed by this group, and, as stated above, we urge the Commission to move forward with the adoption of the rules as proposed in the first part of the instant Notice. Motorola will produce equipment and components for use under the revised frequency hopping regulations in order to respond better to the needs of our customers.

The 2.4 GHz band is the spectrum home of many different communication technologies including HomeRF, Bluetooth, and IEEE 802.11. While Motorola supports the introduction of different technologies in order to create an environment which is responsive to the needs of the end user, we are also concerned about the increased levels of interference in this band that will result from a proliferating number of devices from all of these different technologies. Accordingly, we urge the Commission to remind technology developers of the cardinal requirements for Part 15 operation: (1) do not cause interference to licensed operation and (2) accept interference from other lawful operations (including other Part 15 and Part 18 operations). For that reason, we believe that all technologies operating in this band should be able to detect increased interference levels in their local area of operation, and to respond to those increased levels by reducing the amount of interference that they themselves are generating.

Respectfully submitted,

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